

FLETCHER & LEE
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Attorneys for Thom and Jette Seal

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

In re:

METAL RECOVERY SOLUTIONS, INC.,
aka MRS, INC,

Debtor.

Case No.: 20-50660-gs

Chapter 7 Case

**DECLARATION OF ELIZABETH
FLETCHER, ESQ. IN SUPPORT OF
OPPOSITION TO GEO-LOGIC
ASSOCIATES, INC.'S MOTION TO
APPROVE SALE**

Hearing Date: July 19, 2023
Hearing Time: 1:30 p.m.

I, Elizabeth Fletcher, Esq., do hereby declare and state under the penalties of perjury:

1. I am over the age of 18 years, am mentally competent and have personal knowledge of the matters set forth in this declaration. If called upon as a witness, I could and would competently testify to these matters.

2. I am licensed to practice law in the state of Nevada and am an attorney in good standing. I am the managing shareholder of the law firm of Fletcher & Lee.

3. I represent Thom and Jette Seal (the "Seals") in the above-captioned case.

4. I make this Declaration in support of the Opposition to Motion to Approve Sale.

5. On July 7, 2023, Dr. Seal delivered a cashier's check made out to the "Estate of Metal Recovery Solutions, Inc." in the amount of \$150,000 to my office.

6. I immediately provided the Trustee with a copy of the check.

7. As the Trustee had not required immediate delivery of Dr. Seal's cashier's check

1 and I was required to travel out of town from July 12 – 16, 2023, I locked the cashier's check in a
2 fireproof safe at my residence.

3 8. On July 13, 2023, Trustee's counsel contacted me (while I was working remotely),
4 to request physical delivery of the cashier's check to his office.

5 9. My paralegal, Elizabeth Dendary, was also out of town during the same time frame;
6 thus, there was no one physically in Reno to deliver the cashier's check to the Trustee.

7 10. On July 17, 2023, I promptly delivered the cashier's check to the Trustee.

8 11. On July 17, 2023, I sent an email to GLA's counsel requesting that GLA withdraw
9 the Motion given that the full purchase price had been paid.

10 12. On July 18, 2023, GLA responded that if the Trustee and the Court believe that it
11 would be appropriate to proceed with GLA's offer, GLA was prepared to close.

12 13. The Trustee responded that he intended to accept JEX and Dr.'s Seal's payment.

13 14. I sent another email to GLA asking if it still intended to proceed with the Motion
14 now that the Trustee had indicated that he intended to allow JEX and Dr. Seal to close the sale.

15 15. As of this filing, I have not received a response.

16 16. A true and correct copy of the email exchange is attached to the Opposition as
17 Exhibit A.

18 DATED this 18th day of July, 2023.

19 /s/ Elizabeth Fletcher, Esq.
20 ELIZABETH FLETCHER, ESQ.
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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify under penalty of perjury that I am an employee of Fletcher & Lee, 448 Ridge Street, Reno, Nevada 89501, and that on July 18, 2023, I served the Declaration of Elizabeth Fletcher, Esq. in Support of the Opposition to Motion to Approve Sale by ECF to all those persons registered with the United States Bankruptcy Court for electronic notice in this matter as follows:

SETH J. ADAMS on behalf of Creditor DIFFERENTIAL ENGINEERING INC.
sadams@woodburnandwedge.com, jheston@woodburnandwedge.com

SETH J. ADAMS on behalf of Defendant DIFFERENTIAL ENGINEERING, INC.
sadams@woodburnandwedge.com, jheston@woodburnandwedge.com

MICHAEL B. BROWN on behalf of Creditor JEX TECHNOLOGIES CORP.
michael.brown@stoel.com, dawn.forgeur@stoel.com, docketclerk@stoel.com

LOUIS M BUBALA, III on behalf of Creditor GEO-LOGIC ASSOCIATES, INC.
lbubala@kcnvlaw.com, cdroessler@kcnvlaw.com; bsheehan@kcnvlaw.com

LOUIS M BUBALA, III on behalf of Defendant GEO-LOGIC ASSOCIATES, INC.
lbubala@kcnvlaw.com, cdroessler@kcnvlaw.com; bsheehan@kcnvlaw.com

CHRISTOPHER P. BURKE
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L. EDWARD HUMPHREY on behalf of Debtor METAL RECOVERY SOLUTIONS, INC.
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L. EDWARD HUMPHREY on behalf of Defendant METAL RECOVERY SOLUTIONS, INC.
ed@hlawnv.com, patrick@hlawnv.com, monique@hlawnv.com, megan@hlawnv.com

1 MICHAEL LEHNERS on behalf of Plaintiff CHRISTOPHER P. BURKE
2 michaellehners@yahoo.com

3 MICHAEL LEHNERS on behalf of Trustee CHRISTOPHER P. BURKE
4 michaellehners@yahoo.com

5 EDSON K. MCCLELLAN on behalf of Creditor GEO-LOGIC ASSOCIATES, INC.
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7 RONALD P. OINES on behalf of Creditor GEO-LOGIC ASSOCIATES, INC.
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9 ROBERT T. STEWART on behalf of Creditor JEX TECHNOLOGIES CORP.
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12 AMY N. TIRRE on behalf of Interested Party Element Global, Inc.
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14 AMY N. TIRRE on behalf of Interested Party Empire Capital Management, LLC
15 amy@amytirrelaw.com, admin@amytirrelaw.com

16 U.S. TRUSTEE - RN - 7
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/s/ Elizabeth Fletcher, Esq.
ELIZABETH FLETCHER, ESQ.